

REMARKS

Claims 1-10 and 12-21 are pending in this application. Claims 1, 2, 4, 5, 14, 20, and 21 are amended herein. Claim 11 is cancelled herein without prejudice or disclaimer. Support for the amendments to the claims may be found in the claims as originally filed. Reconsideration is requested based on the foregoing amendment and the following remarks.

Objections to the Drawings:

The drawings were objected to for lacking a descriptive legend for the reference character "TIn" in Fig. 2. The reference character "TIn" has been applied to each instance of the word "subscriber" in paragraphs [0026] and [0027] of the subject application. Withdrawal of the objections to the drawings is earnestly solicited.

Objections to the Specification:

The Specification has been objected to for various informalities. Appropriate corrections were made. Withdrawal of the objection is earnestly solicited.

Objections to the Claims:

Claim 21 was objected to for an informality. Claim 21 was amended in substantial accord with the Examiner's suggestion. The Examiner's suggestion is appreciated. Withdrawal of the objection is earnestly solicited.

Claim Rejections - 35 U.S.C. § 112:

Claims 2, 5, and 14 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Claims 2, 5, and 14 were amended to make them more definite. In particular, the recitation "address information" is now "third address information" in claim 2, the recitation "the duration" is now "a duration" in claims 5 and 14, and the word "when" is now "if" in claim 5.

Thus, in claim 5, a temporary call number is assigned to the particular communication terminal by the alternate communication device for a duration of the connection *if* the standardized terminal profile is adapted to the particular communication terminal, through the second address. Claims 2, 5, and 14 are believed to be definite within the meaning of 35 U.S.C. § 112, second paragraph. Withdrawal of the rejection is earnestly solicited.

Claim Rejections - 35 U.S.C. § 102:

Claims 1-8, 10-17, and 19 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,119,001 to Delis et al. (hereinafter "Delis"). The rejection is traversed to the extent it would apply to the claims as amended. Reconsideration is earnestly solicited.

The third clause of claim 1 recites:

Storing a second address in each communication terminal for a connection to an alternate communication device.

Delis neither teaches, discloses, nor suggests "storing a second address in each communication terminal for a connection to an alternate communication device" as recited in claim 1. In Delis, rather, the default subscriber profile for the mobile station 14' is retrieved from the *home location register 20* in step 314, and delivered to the visitor location register 22. In particular, as described at column 6, lines 57-61:

The default subscriber profile for the mobile station 14' is then retrieved from the home location register 20 in step 314, and delivered to the visitor location register 22 (with confirmation of service to the switching node) in step 316.

Later in the process, the visitor location register *deletes* (action 238) the previously downloaded default subscriber profile for the roamer mobile station 14'. In particular, as described at column 6, lines 19-22:

Responsive thereto, the visitor location register deletes (action 238) the previously downloaded default subscriber profile for the roamer mobile station 14'.

This is to be contrasted with the claimed invention, in which a standardized terminal profile is -- permanently -- stored in the alternate communication device, and which will be adapted once it will be used, but will never be deleted or created again. Since Delis, on the other hand, deletes the previously downloaded default subscriber profile for the roamer mobile station 14', Delis is not "storing a second address in each communication terminal for a connection to an alternate communication device" as recited in claim 1.

Nor is the temporary subscriber number, to which the Office Action analogizes the recited "second address," stored in the *mobile* station, to which the Office Action apparently analogizes the recited "communication terminal." In Delis, rather, the temporary subscriber number (TSNB) is stored in the pool of available temporary subscriber numbers assigned to the home location register 20, and returned there upon deactivation. In particular, as described at column 6, lines 11-14:

This deactivation procedure includes, as one action 230, the returning of the assigned temporary subscriber number (TSNB) to the pool of available temporary subscriber numbers assigned to the home location register 20.

Since, in Delis, the temporary subscriber number (TSNB) is stored in the pool of available temporary subscriber numbers assigned to the home location register 20, and returned there upon deactivation, Delis is not "storing a second address in each communication terminal for a connection to an alternate communication device" as recited in claim 1.

Finally, in Delis, the temporary subscriber number is a *subscriber* number for connecting the roaming subscriber within the network 10, not an address "for a connection to an alternate communication device" as recited in claim 1. In particular, as described at column 5, lines 5-15:

Instead of sending the error message 212, as in FIG. 2B, indicating that the mobile station 14' mobile identification number is not recognized, the home location register 20 recognizes that this is a roamer first registration and initiates an activation procedure for automatically defining and connecting the roaming subscriber within the network 10. This activation procedure includes, as one action 214, the selection of a temporary subscriber number (TSNB) for the mobile station.

Since, in Delis, the temporary subscriber number is a subscriber number for connecting the roaming subscriber within the network 10, Delis is not "storing a second address in each communication terminal for a connection to an alternate communication device" as recited in claim 1.

The fourth clause of claim 1 recites:

Storing in the alternate communication device a standardized terminal profile.

Delis neither teaches, discloses, nor suggests "storing in the alternate communication device a standardized terminal profile," as recited in claim 1. The default subscriber profile of Delis, rather, to which the Office Action analogizes the recited "standardized terminal profile," is a *default* subscriber profile, not a standardized terminal profile.

The default subscriber profile of Delis, moreover, is *deleted* after the roamer mobile station 14' leaves the system, as discussed above. If, on the other hand, the default subscriber profile of Delis were *standardized*, the default subscriber profile could presumably be *reused* by other mobile stations entering the system, and thus would not be deleted. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 10-17 and 19 depend from claim 1 and add further distinguishing elements. Claims 10-17 and 19 are thus also submitted to be allowable. Withdrawal of the rejection of

claims 10-17 and 19 is also earnestly solicited.

Claim Rejections - 35 U.S.C. § 103:

Claims 1-4, 9, 12, 18, 20, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the section of the subject application entitled "Background of the Invention," (hereinafter "Background") to which the Office Action refers as "applicants admitted prior art," in view of U.S. Patent No. 7,075,932 to Matsuhira et al. (hereinafter "Matsuhira"). The rejection is traversed to the extent it would apply to the claims as amended. Reconsideration is earnestly solicited.

Neither the Background nor Matsuhira teach, disclose, or suggest "storing in the alternate communication device a standardized terminal profile" as recited in claim 1. The Office Action acknowledges this deficiency with respect to the Background at the bottom of page 11, and attempts to compensate for it by combining the Background with Matsuhira. Matsuhira, however, is not "storing in the alternate communication device a standardized terminal profile" as recited in claim 1 either, and thus cannot make up for the deficiencies of the Background in any case.

Matsuhira, in fact, mentions no "standardized terminal profile" at all. Nor does the Office Action assert that Matsuhira does show a "standardized terminal profile." Routing information of packets based on a dynamic routing protocol, to which the Office Action apparently analogizes the recited "standardized terminal profile," is not a "standardized terminal profile." The second routing information of Matsuhira, rather, corresponds to next *hop* information. In particular, as described at column 4, lines 52-58:

The dynamic routing table 3 is a routing table created based on dynamic routing. The dynamic routing table 3 is created according to a routing protocol such as RIP, OSPF etc. The dynamic routing table 3 contains next hop information (corresponding to second routing information of a packet) corresponding to destination information (which corresponds to a common search key) of the packet 6.

Since, in Matsuhira, the second routing information of the packet corresponds to a next hop information, Matsuhira is not "storing in the alternate communication device a standardized terminal profile" as recited in claim 1. Thus, even if the Background in Matsuhira were combined as proposed in the Office Action, claim 1 would not result.

Finally, the Office Action provides no motivation or suggestion to combine the teachings of the Background and Matsuhira, as required by 35 U.S.C. § 103(a) and the M.P.E.P. §706.02(j)(D), beyond the assertion that

At the time the invention was made, it would have been obvious to a person of ordinary skill of the art to modify the teachings of the prior art admitted by the applicant wherein the alternate destination address of a communication device in figure 1 in applicant admitted art would have incorporated pieces of address mask information in order to make searchable a network unit of the destination or a predetermined aggregated unit via dynamic routing.

The Office Action, however, acknowledged at the bottom of page 11 that the Background "fails to disclose a methodology of storing in the alternate communication device, a standardized terminal profile," not "pieces of address mask information in order to make searchable a network unit of the destination or a predetermined aggregated unit via dynamic routing."

Thus, even if persons of ordinary skill in the art at the time the invention was made were motivated to modify the Background as postulated in the Office Action, the motivation would be toward modifying the Background to include "pieces of address mask information in order to make searchable a network unit of the destination or a predetermined aggregated unit via dynamic routing," which is not recited in claim 1.

Since claim 1, rather, recites "storing in the alternate communication device a standardized terminal profile," even if persons of ordinary skill in the art at the time the invention was made were motivated to modify the Background as postulated in the Office Action, claim 1 would not result.. It is submitted, therefore, that the Office Action has failed to make a *prima facie* case of obviousness with respect to claim 1, since the motivation stated in the Office Action would not produce the invention claimed in claim 1. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 2, 3, 4, 9, 12, and 18 depend from claim 1 and add additional distinguishing elements. Claims 2, 3, 4, 9, 12, and 18 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2, 3, 4, 9, 12, and 18 is earnestly solicited.

Claims 20 and 21:

The eighth clause of claim 20 recites:

At least one standardized terminal profile included in terminal-relevant data in the alternate communication device.

Neither the Background nor Matsuhira teach, disclose, or suggest "at least one standardized terminal profile included in terminal-relevant data in the alternate communication device," as discussed above with respect to the rejection of claim 1. The motivation for modifying the Background stated in the Office Action, moreover, would not lead to the invention claimed in claim 20, as also discussed above with respect to the rejection of claim 1. Claim 20 is submitted

to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 20 is earnestly solicited.

Claim 21 depends from claim 20 and adds further distinguishing elements. Claim 21 is thus also submitted to be allowable. Withdrawal of the rejection of claim 21 is earnestly solicited.

Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-21 are allowable over the cited references. Allowance of all claims 1-21 and of this entire application is therefore respectfully requested.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

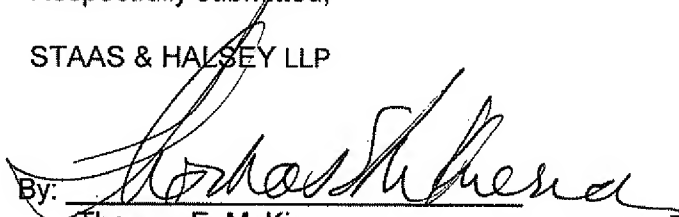
Respectfully submitted,

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Attachment: clean copy of substitute specification